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February 13, 2025

VIA ECF

MEMORANDUM ENDORSED

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
Thurgood Marshall
United State Courthouse
40 Foley Square
New York, NY 10007
(212) 805-4260

Re: *Noble Security, Inc., et al. v. ACCO Brands Corporation*, No. 16-cv-09129-MMG-GWG
Request for Extension of Time

Dear Judge Gorenstein,

This firm represents Defendant ACCO Brands Corporation (“Defendant”), in connection with the above-referenced matter. Defendant files this letter-motion respectfully requesting an extension of time, to and including, February 27, 2025, to file a renewed motion to seal certain documents related to the parties’ summary judgment motions pursuant to the Court’s order denying the parties’ initial motions to seal such documents dated February 6, 2025 (Docket No. 181).

Defendant requests this extension because Defendants’ sole previous counsel of record, Michael G. Babbitt, unexpectedly passed away on February 3, 2025 and our firm is coping with his tragic loss while redistributing his case portfolio. Defendant submits that this constitutes good cause for the requested extension of this deadline.

Defendant has not made any prior requests for an extension of this deadline. Counsel for Plaintiff, Max Moskowitz, has consented to the proposed extension of time. The requested extension does not affect any other scheduled dates in this matter. Thus, Defendant moves for an extension of time to file a renewed motion to seal to and including February 27, 2025.

We thank the Court for its consideration of this request.

Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP
Attorneys for Defendant

/s/ Heather M. Schneider
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*Attorney for Defendant and Counterclaim-
plaintiff ACCO Brands Corp.*

cc: Counsel of Record (*via* ECF)

Extension to February 27, 2025, granted.

So Ordered.



GABRIEL W. CORENSTEIN
United States Magistrate Judge

February 13, 2025